



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Mrs. Jane Sulima  
647 Welsh Road  
Philadelphia, PA 19115

MAY 12 1989

Re: C & D Recycling Site  
Response to Information Requests

Dear Mrs. Sulima:

This correspondence serves to respond to issues raised and information requested in letters forwarded to EPA on January 31, March 18, April 10, April 18, and April 19, 1989 from both yourself and Mr. Marvin Lewis.

We have enclosed information that responds to your request (1/31/89) for documentation of the handling and disposal of the contents of the underground storage tanks at the C & D site. Included are copies of the receipt from the Clinton County Solid Waste Wayne Township Landfill, the disposal location for the tank contents, and the certificate of receipt from M.H. Brenners' Scrap Yard for the decontaminated tanks. You should be advised that the PADER approves and permits the landfilling of oil, and thus the tank contents from C & D were properly disposed of at the above referenced landfill. While the source of the oil is not detailed on the landfill receipt, the volume of material and date of transaction correspond with the onsite observation of the tank removal activities.

Your March 18, 1989 letter to EPA requests clarification of of several notations made within the Quality Assurance/Quality Control package forwarded to you for the 9/26/88 "blue water" sample collected from your Foster Township property. The quality control package is produced by the laboratory during its analysis of samples in accordance with the contract requirements under which the laboratory operates. This contract mechanism is termed the "Statement of Work for the Contract Laboratory Program", and can be made available to you if you should have additional questions regarding these procedures.

The quality assurance/quality control information is required by the Contract Laboratory Program (CLP) to include documentation of all stages of the analytical process. As the samples are released by the laboratory, they are delivered to a second party (contractor) for validation. Such validation occurs in accordance with procedures set forth under the CLP. Once the data is validated, EPA receives a data validation report documenting these activities, and prepares the data for release to citizens and/or for use in scoping the project of concern.

AR501062

EPA has discussed your questions regarding the quality control material with Hart's Quality Assurance Officer, after completing a review of the calibration and spiking documentation. It appears that you have observed notations made by the laboratory technician during the analysis of the 9/26/88 sample. While the spiking notation indicates "wrong spiking solution used", it continues to document the repetition, using the correct solution, of this exercise. Our review of the calibration documentation did not reveal any problem as you have indicated.

At this time we would like to respond to several questions raised in your April 10 letter to Michael Towle, EPA's hydrogeologist for the C & D site. Hart has reported that they use a polyethylene plastic container for the sampling of residential wells. The fixing of well samples collected from your property occurred at the site office, as an effort to prevent spills of nitric acid during the sampling. The samples were fixed (inorganic samples with nitric acid, cyanide with caustic soda) and pH levels were checked again prior to preparing the bottles for shipping. Temperature measurements were taken by Hart using an electronic thermometer that, according to Hart is calibrated in the office prior to conducting the sampling. If, during this calibration, the instrument does not function properly, it is not taken to the field, and an alternate instrument is selected and calibrated. The conductivity meter is calibrated at the factory it originates from. In addition, a gallon per minute measurement was not taken during the sampling. The sampling protocol required that the well be run approximately thirty minutes, and this was followed during the 9/26/88 event.

Both your April 10 and April 18 letters request information regarding the role of Proctor and Gamble in the evaluation of the blue water occurrence with your well water. Through contact with Hart we have been informed that while Proctor and Gamble had agreed to cooperate with Hart's/AT & T's evaluation of the reaction between your hot tap water and Ivory soap, they did not conduct laboratory analysis of the water sample. CompuChem, a laboratory under contract with Hart for the C & D project, completed the analysis of your 9/26/88 tap sample. This material, as well as the quality assurance/quality control package for this sample were forwarded to you previously by EPA.

You continue to state in your correspondence that your husband's observation of the 9/26/88 sampling event contradicts the information made available to you by EPA and Hart. If you have information that contradicts the sampling procedures as reported by Hart, please forward such material to EPA so that we can resolve this difference.

AR501063

Your April 18 letter to EPA refers to our evaluation of the PADER analysis of the filter from your Foster Township property. EPA evaluated the filter analysis based strictly on information provided to us by PADER. Since PADER collected your filter for analysis, we recommend that you contact them for further evaluation of the analytical results.

In response to Marvin Lewis' April 19 letter to EPA, we have enclosed a copy of the Data Validation Report for the samples collected from residences in October 1988. As stated earlier, this report is the form in which EPA receives the data from the laboratory, and which is the basis for our communicating sampling results to citizens. We anticipate that this report will satisfy Mr. Lewis's request.

Sincerely,

*Donna M. McCartney*  
Donna M. McCartney  
Project Manager (3HW12)

Enclosures

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